

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
 v.) CASE NO. 3:10-cr-00260
) JUDGE HAYNES
ABDULLAHI HASHI (11))

DEFENDANT ABDULLAHI HASHI'S MOTION IN LIMINE NO. 2

Defendant Abdullahi Hashi (11), by and through the undersigned counsel, moves this Court to exclude from evidence Defendant Abdullahi Hashi's immigration status or other matters contained in Government Exhibit 102, which is designated "A-File Abdullahi Hashi a/k/a Kamal."

Defendant Hashi objects to any attempt by the government to introduce evidence as to his immigration status, and whether Defendant Hashi was a permanent resident alien or some other status at the time of the alleged offenses listed in the Second Superseding Indictment. Evidence of Defendant Hashi's immigration status or the reasons why he immigrated to the United States from Somalia are not relevant to the elements of sex trafficking that the government must prove under 18 U.S.C. § 1591(a), and any probative value that might be attached to the evidence is substantially outweighed by the danger of unfair prejudice and misleading the jury. See, Fed. R. Evid. 403. In addition, the A-File itself is not reliable on its face since it lists Defendant Hashi's date of birth as "01/01/86" and also lists his six (6) siblings as having a January 1 birth date.

For these reasons, Defendant Hashi requests the Court exclude from evidence testimony or the introduction of the "A-File" listed by the Government as Exhibit 102.